

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

GREGORY STARK, et al.,

Case No. 1:20-cv-01254

Plaintiffs,

-vs-

JUDGE PAMELA A. BARKER

KEYCORP, et al.,

Defendants.

**CASE MANAGEMENT CONFERENCE
ORDER**

A Case Management Conference (“CMC”) was held in this matter on **May 25, 2021**. The parties and counsel of record agreed to the following, and **IT IS ORDERED** that:

1. This case is assigned to the **complex** track.
2. This case was referred to Alternative Dispute Resolution (“ADR”):
Yes _____ No X Decision delayed _____
If yes, by the following ADR process: Early Neutral Evaluation _____ Mediation _____
Arbitration _____ Summary Jury Trial _____ Summary Bench Trial _____
3. The parties **do not** consent to the jurisdiction of a United States Magistrate Judge pursuant to 28 U.S.C. § 636(c) at this time.
4. The **pleadings shall be amended without leave of Court and new parties shall be joined on or before September 10, 2021**.
5. The parties **have exchanged the pre-discovery disclosures required by Fed. R. Civ. P. 26(a)(1)**.
6. As to Electronically Stored Information, the parties have **agreed to a method for conducting discovery of electronically stored information**.

7. **Schedule for Conditional/Class Certification, Opt-In Discovery, and Notice:** Where parties are not in agreement regarding certification, the deadline for discovery regarding certification motions is **November 11, 2021, including Plaintiffs' depositions by November 11, 2021.** Plaintiffs' Motion for Class Certification is due **November 23, 2021.** Response shall be due no later than thirty (30) days after the filing of Plaintiffs' Motion for Class Certification.

8. **All other non-expert discovery shall be completed by March 11, 2022.** Discovery shall be conducted according to the guidelines set forth in Local Rule 16.2 for cases assigned to this track. The Court directs the parties to comply with Local Rule 37.1 before filing any motions seeking aid from the Court in discovery matters.

9. **All other expert discovery shall be completed by July 1, 2022.** The party initially seeking to introduce expert testimony shall exchange his or her Expert Report on or before **April 8, 2022.** Responsive Expert Reports shall be exchanged on or before **May 6, 2022.** Rebuttal Expert Reports shall be exchanged on or before **June 3, 2022.**

10. **Dispositive Motions shall be filed on or before July 29, 2022.** Responses to dispositive motions must be filed within thirty (30) days of the service of the dispositive motion. Replies must be filed within fourteen (14) days of the service of the response. (See Local Rule 7.1). No sur-reply brief may be filed without leave of Court. No request for an extension of time will be entertained unless it is filed prior to the response date from which extension is sought and it indicates whether opposing counsel consents or objects to the requested extension.

11. **A telephonic status conference with lead counsel is set for August 26, 2021 at 2:30 p.m.** Counsel shall confer within five (5) business days of the scheduled conference to discuss outstanding issues and respective positions as to settlement. Counsel shall provide to the Court within three (3)

business days of the conference, a joint Status Report or confidential individual Status Reports describing the status of discovery, settlement positions, and issues to be addressed. The Status Reports need not be filed, but may be delivered via email to Barker_Chambers@ohnd.uscourts.gov

IT IS SO ORDERED.

Date: May 25, 2021

s/ Pamela A. Barker
PAMELA A. BARKER
U. S. DISTRICT JUDGE